

AFFIDAVIT FOR SEARCH WARRANT

Commonwealth of Virginia

VA. CODE § 19.2-54

ORIGINAL

The undersigned Applicant states under oath:

1. A search is requested in relation to ☒ an offense substantially described as follows:
☐ a person to be arrested for whom a warrant or process for arrest has been issued identified as follows:
 § 18.2-178.1 (A) Obtaining money or signature, etc., by false pretense.
 § 18.2-22. Conspiracy to commit felony.

☒ CONTINUED ON ATTACHED SHEET

2. The place, person or thing to be searched is described as follows ☒ and is a place of abode:

47 S. Windsong Court

Fishersville, Virginia 22939

Legal Description: 67a3-(3)-71 Windward Pointe Sec 3 Lot 71 .334 acres

47 S. Windsong Court Fishersville, VA is a light brown multi-level 4-bedroom 4,768 square foot residential dwelling located in the southwest corner of the cul-de-sac, facing northeast. The numerals "47" are affixed to the front of the residence above the front door. The residence has black shutters, a brown roof and is further distinguished by barriers and armed security on site, posted near the foot of the driveway.

☒ CONTINUED ON ATTACHED SHEET

3. The things or persons to be searched for are described as follows:

Any and all electronic devices, including desktop computers, laptop computers, PDA's, Tablets, Smartphones, storage devices, external hard drives, flash memory cards, SD cards or other electronic equipment that may contain electronic data or files that may have been used to communicate with DuPont Credit Union, MetLife Life insurance, FedEx, SunTrust Atlanta, Williams Mullen Clark & Dobbins, PC, Vital Records Section, Bureau of Vital Statistics, Florida Department of Health, or devices which contain records, data of files associated with the aforementioned entities.

Your affiant also seeks any letters, statements, correspondence, ledgers, files or writings associated with the aforementioned entities.

☐ CONTINUED ON ATTACHED SHEET

(OVER)

FILE NO.

**AFFIDAVIT FOR
SEARCH WARRANT**

APPLICANT:

Brian J. Jenkins

NAME

Major

TITLE (IF ANY)

127 Lee Highway

ADDRESS

Verona, Virginia 24482

Certified to Clerk of

Circuit Court

on

DATE

TITLE

SIGNATURE

Original Delivered ☐ in person ☐ by certified mail
☐ by electronically transmitted facsimile
☐ by use of filing/security procedures
 defined in the Uniform Electronic
 Transactions Act

to Clerk of Circuit Court
 CITY OR COUNTY WHERE EXECUTED

on

DATE

TITLE

SIGNATURE

4. The material facts constituting probable cause that the search should be made are:
Please see attached Section 4.

5. The object, thing or person to be searched for ☒ constitutes evidence of the commission of such offense ☐ is the person to be arrested for whom a warrant or process for arrest has been issued.
6. ☐ Authorization to execute a search warrant of a place of abode other than in the daytime hours between 8:00 a.m. and 5:00 p.m. is requested.
The material facts constituting good cause for such authorization are:

☒ Reasonable efforts were made to locate a judge, and a judge is not available, before seeking authorization from a magistrate to execute a search warrant other than in the daytime hours between 8:00 a.m. and 5:00 p.m., with those reasonable efforts being as follows:

OR ☐ Reasonable efforts were not made to locate a judge as the following circumstances require the issuance of the search warrant after 5:00 p.m.:

7. ☐ I have personal knowledge of the facts set forth in this affidavit AND/OR
☒ I was advised of the facts set forth in this affidavit, in whole or in part, by one or more other person(s). The credibility of the person(s) providing this information to me and/or the reliability of the information provided may be determined from the following facts:

Your affiant, Major Brian Jenkins, has been a sworn Virginia Law Enforcement Officer since 1994, and has been employed by the Augusta County Sheriff's Office since 2006. Your affiant has extensive experience in criminal investigations, and served in the Criminal Investigations Division of the Augusta County Sheriff's Office from 2006-2018 in varying roles. Your affiant has investigated numerous financial crimes and crimes involving the use of technology.

Special Agent Jane Collins began her career in 1990 and retired in 2021 after 31 years of service with the FBI. Collins specialized in Complex Financial Crimes that included bank fraud, securities fraud, health care fraud, wire and mail fraud from 1999-2021, and she personally investigated this case while with the Bureau.

The statements above are true and accurate to the best of my knowledge and belief.

Major

TITLE OF APPLICANT

3

Maj. Brian Jenkins

APPLICANT

Subscribed and sworn to before me this day.

10/3/22 1:13pm

DATE AND TIME

J. Keffer

☐ CLERK

☒ MAGISTRATE

☐ JUDGE

Section 2 (Cont.) *The place, person or thing to be searched is described as follows [X] and is a place of abode:*

Maps of 47 S. Windsong Court, Fishersville, Virginia 22939



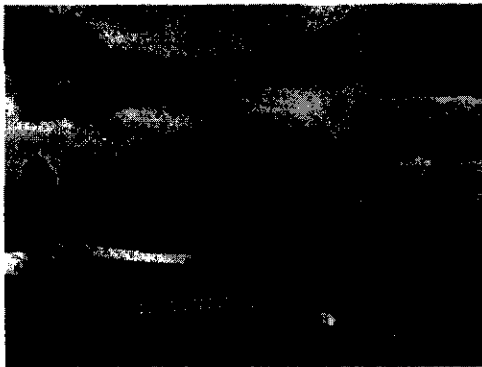
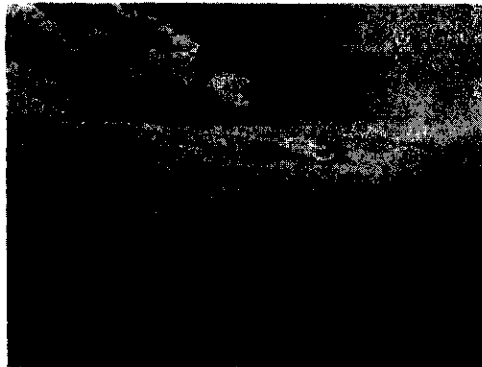
J.O. Kellner
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13pm
Date/Time

Section 2 (Cont.) *The place, person or thing to be searched is described as follows [X] and is a place of abode:*

Photos of 47 S. Windsong Court, Fishersville, Virginia 22939 (Note armed security on site)



J.O. Kaffer
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

On August 30, 2022, your affiant met with Augusta County Sheriff Smith, Augusta County Commonwealth Attorney Timothy Martin, and DCA Alex Meador at the Commonwealth Attorney's Office about a case of obtaining money by false pretense and conspiracy. Special Agent Jane Collins, who is known to your affiant, with the Federal Bureau of Investigation initially, generated this case. Federal authorities forwarded the matter to the Augusta County Commonwealth Attorney via the US Attorney for the Western District of Virginia.

The purpose of our meeting on August 30th was for your affiant to be read into the case, and for the Augusta County Sheriff's Office to conduct a local criminal investigation.

This investigation is related to a series of communications and complaints to Federal Law Enforcement dating back to May of 2016 when Sheriff Smith and Commonwealth Attorney Martin first contacted the Federal Bureau of Investigation about Nexus, and its owners Michael Paul Donovan and Richard Moore.

Augusta County Commonwealth Attorney Timothy Martin was given copies of reports, Grand Jury transcripts, subpoena results, and a host of other information. The records provided to your affiant contained documents from the investigation that commenced in 2016, and a more recent investigation by FBI S/A Jane Collins into Donovan, Moore, and Zachary Cruz and their acquisition of a death benefit for \$426,553.30 with Zachary Cruz as the beneficiary.

Zachary Paul Cruz is the brother of the convicted mass murderer at Marjory Stoneman Douglas High School, Nikolas Cruz. Nikolas Cruz plead guilty to the 2018 Marjory Stoneman Douglas High School shootings in 2021 and his death penalty case is currently the sentencing portion of the trial in Broward County, Florida. Zachary Paul Cruz was arrested on March 19, 2018, on a misdemeanor trespassing charge at Marjory Stoneman Douglas High School in Parkland, Florida, and while Zachary was being held in Broward County, Florida, Michael Paul Donovan of Nexus Services contacted him. Nexus and Donovan intervened on Zachary's behalf, offering him legal representation, a job in Virginia, and housing. Cruz was released on probation on May 11, 2018, and subsequently moved to Staunton, Virginia.

Donovan is reported by S/A Collins to have been aware of a substantial death benefit that was pending for both Zach and Nikolas Cruz after their mother's death. The FBI investigation launched by Special Agent Collins focused on Michael Donovan, Richard Moore, and Timothy Shipe's subsequent activities in falsely obtaining the inheritance/death benefit due to Zachary Cruz.

From reports, documents, and the investigation compiled by S/A Collins, your affiant has learned the following facts:

2/14/2018: Nikolas Cruz commits the mass shooting at the Marjory Stoneman Douglas High School in Parkland, Florida. *(Fourteen students and three staff members were killed, and seventeen others were injured).*

J.O. Keffew
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13 pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

3/2018: Zachary Cruz is arrested for misdemeanor trespass. Prosecutor states, "He has all the same flags present as his brother." Prosecutor also said he posed a threat of "intimidation and danger" to the Stoneman Douglas victims. The judge upped his bond to \$500,000 Zach remained in custody for 10 days - most of which was spent in a psychiatric facility followed by a solitary cell where he was placed on suicide watch, despite Zach's insistence that he was not suicidal. (Joseph Kimok was Zach's assigned defense attorney.)

5/13/2018: Donovan and Zachary Cruz depart Broward County, Florida to Virginia. (Interview transcript is attached). Donovan mentioned that his company's law firm has sued Broward County on behalf of Z. Cruz. Cruz mentions that he has a job in Virginia.

10/13/2018: Zachary Cruz is charged with Reckless driving; Speeding over 80mph (clocked at 98mph) in Albemarle County, Virginia by the Albemarle County Police. He provides the local address of 19 Kimberley Street in Staunton, Virginia.

2/4/19: Zachary Cruz is deposed as part of a case *Zachary Paul Cruz, Plaintiff vs. Captain Veronica Carroll, et al (Attorneys for Plaintiff Dallas S. LePierre, Esq. Mario Bernard Williams, Esq. Nexus Derechos Humanos Attorneys, Inc. 44 Broad Street, N.W., 200, Atlanta, GA*

In his deposition: (Page 94 - 97)

Cruz states: "She (Roxanne) was trying to help me with my mom's estate".

In his deposition: (pages 130 -133)

I know from your mom that you inherited money through a life insurance policy. Did you inherit sufficient money that you could have paid a bond to cover the bond?

"I don't have any of that money in my possession. It's all caught up in the case".

"I think I have a \$25,000 check, but I don't know about it. I still don't have it, so".

4/23/2019: Broward County Public Defender's Office contacts MetLife.

4/24/2019: Public Defenders' Motion to Withdraw - State of Florida v. Nikolas Cruz

In the filing:

- It has come to the attention of the undersigned counsel that Nikolas Cruz is a beneficiary in a MetLife Life insurance policy and is entitled to half of a death benefit valued at \$864,929.17 as of April 23, 2019.

- The Defendant and undersigned counsel were previously unaware of this entitlement.

J.O. Keffe
Magistrate

B Maj. Brian Jenkins
Affiant

10/3/22 1:13pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

4/26/2019: The Office of the State Attorney filed a response to the motion, arguing that the motion must be denied for numerous reasons, including the fact that Defendant's liabilities were not considered, the cost of trying this case was not considered, and the Defendant's access to the 50% portion of the funds was not demonstrated in light of the several lawsuits and judgments that are pending against him.

4/26/2019: Michael Donovan calls MetLife and states, *"I work with a law firm that represents one of the beneficiaries. Um, it is, um he's incarcerated so the attorneys are trying to deal with him, um, and would like to take a claim form to him..."*

Donovan provides the contract number 7700193269 to the MetLife representative.

Donovan also provides his telephone number: 757-344-5139.

06/12/2019: Cruz opens a joint checking account with Richard Moore at DuPont Community Credit Union in Verona, Augusta County, Virginia Account number 909258. Under the primary owner, Zachary Cruz's residence is listed as the same as Donovan and Moore, 47 S. Windsong Court, Fishersville, Augusta County, Virginia. The telephone number provided for the account (540) 290-7040 is Sam Orlando's number. (Sam Orlando is the adopted son of Michael Donovan and Richard Moore.) The email provided is Richard Moore's encrypted email: remva777@protonmail.com

6/24/2019: Zachary Cruz is issued an identification card from the Commonwealth of Virginia. On the Driver's License and Identification Card Application, Cruz under the Replacement License or Identification Card, states "I certify I cannot surrender my current license or ID card because it is: checked LOST.

7/5/2019: Michelle Dobbs, Paralegal, Nexus Derechos Humanos Attorneys, Inc. 44 Broad Street, N.W., 200, Atlanta, GA 30303 (mdobbs@ndhlawyers.com) calls MetLife. She provides the annuity contract no. 770193269 and their client is Zachary Cruz. In the transcript of this call, Dobbs mentions that *"I have a letter that I think was sent to one our clients about a beneficiary confirmation. And we just needed to know what steps he had to take to I guess receive the benefits."*

7/9/2019: Michelle Dobbs, Paralegal, Nexus Derechos Humanos Attorneys, Inc. 44 Broad Street, N.W., 200, Atlanta, GA 30303 (mdobbs@ndhlawyers.com) calls MetLife. Dobbs provides her telephone number: 404-254-0442. Dobbs asked MetLife if they have the death certificate for Lynda Cruz. MetLife instructs her, and in the transcript of the call Dobbs states: *"Yeah, I would send a copy of the death certificate."*

7/27/2019: Beneficiary Claim Form signed and dated for Contract Number: 7700193269. The phone number provided on the Beneficiary claim form: 757-344-5127 and email: remva777@protonmail.com (Richard Moore's telephone number and e-mail).

J.O. Keffner
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13 pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

The identification Card obtained by Cruz on 6/24/2019 is provided with the Beneficiary Claim Form.

7/29/2019: Certification of Death issued for Lynda M. Cruz.

8/2/2019: MetLife WDM scans the Beneficiary Claim Form at 9:10 a.m.

8/6/2019: MetLife phone call. An internal phone call between MetLife employees regarding the Lynda Cruz annuity contract. Nico Last Name Unknown (LNU) tells Sean Ahrens of MetLife, "*...50 he has passed full security, he's given me uh the whole shebang uh he is eager to know if we have resolved the settlement and uh wants a check overnighted to him immediately uh but I checked WinWeb didn't I didn't even see anything in there but I saw the alert so. Alright, uh here he comes, and he is all yours*".

8/6/2019: Sean Ahrens talks with an individual that represents himself as Zachary Cruz. *(It is believed that Tim Shipe, Nexus Services, Inc. called MetLife purporting to be Zachary Cruz.)* A close friend and associate of Shipe's later identified Shipe as the caller to the FBI *(after listening to a segment of the call that does not identify Cruz/MetLife as the participants)*. Additionally, telephone subscriber information, toll records, and the telephone number provided by the caller support the caller is Tim Shipe, Nexus Services, Inc., VP of Support Services.

From the transcript of this call:

ZC/TS: Uh, the question was, I know that they are processing everything right now cause they received the package on Friday (8/2/2019). Do you know, do you know how they mail out the payment? Do they mail if FedEx, certified mail, do you know?

MetLife: Uh it would go out regular mail.

ZC/TS: Ok, and if you need to I can send you the FedEx label. I can mail it to you, I have ...we have a FedEx account so MetLife: Ok, so the number is 515-457-2519 (Ahrens providing his direct line).

ZC/TS: Cool. And can I give you a secondary phone number for myself because sometimes if you call the name ...that number that you have you won't get to us because it's always busy. Um you can call also call 540-448-5873. *(AT&T phone records reflect that Timothy Shipe is the "user" of this telephone number)*.

8/6/2019: Michael Donovan (757-344-5139) calls Timothy Shipe's telephone number.

Timothy Shipe's toll records reflect that he dials 17700193269 twice after the call with Michael Donovan. This is the Annuity contract number for Lynda Cruz 7700193269. The "phone call" does not go through. Thereafter, Tim Shipe's toll records reflect that he calls MetLife telephone # 18006387732. The phone conversation lasts at 1:21 and then a second call for 5:33. It is believed that these are the two recordings that were captured by MetLife and have been transcribed.

J.O. Keffner
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13 pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

8/7/2019: FedEx Ship Date from MetLife/Ahrens Sean to Zachary Cruz, 47 S. Windsong Court, Fishersville, VA 22939. TRK# 788974687804.

8/8/2019: FedEx TRK# 788974687804 delivered Thursday, 8/08/2019 at 11:27 a.m. Signed for by M. Pritchett. Two checks are enclosed in the FedEx package:

MetLife Checks:

Payable to Zachary Cruz for \$207.17

Payable to Zachary Cruz for \$426,553.30

8/8/2019: Jeffrey Jordan Bushong, Assistant Executive Administrator, Nexus Services, Inc. deposits both the above-described checks from MetLife into Zachary Cruz's DuPont Community Credit Union account number 909258. The checks are deposited Thursday, 8/08/2019 at 2:12 PM. (It should be noted that on 8/7/2019 there is a withdrawal transfer REF#8094158 from Donovan & Moore's account to Bushong, Jeffrey for \$320.00 on 8/7/2019.

Richard Moore's toll records reflect a telephone call to Bushong on 8/7/2019 and two (2) phone calls from Bushong on 8/8/2019.

8/12/2019: 9:21 a.m. DuPont Community Credit Union records reflect the following online transaction:

Action was taken: execute immediate transfer IP Address: 73.147.9.49. Reflected on Richard Edward Moore and Michael Paul Donovan, 47 S Windsong Ct Fishersville, VA DuPont CCU Account 943:

08/12/2019 DEPOSITTRANSFERREFE#8119069 FROM CRUZ, ZACHARY P

At 11:30 a.m. Richard Moore conducts a wire transfer at DuPont Community \$300,000.00 (Note: the balance before the transfer was \$2,941.68)
IP address: Subscriber is Richard Moore Telephone # is (757) 344-5127

DuPont Credit Union \$300,000.00.
Originator: Richard Moore
Receiving Financial Institution: Suntrust Atlanta
Beneficiary: Williams Mullen Clark & Dobbins, PC

Records reveal that this \$300,000 wire transfer was utilized to pay delinquent Federal taxes.

An Official Check 5301020706 (Suntrust) from Williams Mullen for \$300,000.00 made payable to INTERNAL REVENUE SERVICE was obtained by S/A Collins. Handwritten on the Official Check is *Nexus Services, Inc. EIN 46-4996933 Form 941/Period Ending March 31, 2019.*

J.O. Keffer
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 (TOR)
10/13/22 1:13 pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

8/13/2019: 14:15 DuPont Community Credit Union records reflect an: Action was taken: execute immediate transfer IP Address 23.25.102.169. DEPOSITTRANSFERREFE#8125044 FROM CRUZ, ZACHARY P \$100,000.00 (Note: the balance before the transfer was \$6,044.95)

IP Address: Subscriber is Account Services (Nexus Services, Inc. address 113 Mill Place Parkway, Verona, VA)
The telephone number is (757) 344-5127. *(Resolves back to Richard Moore)*

An accounting of all the disbursement of this \$100,000.00 by S/A Collins and the Federal Bureau of Investigation indicates that a significant portion of these funds went to pay for luxury vehicle payments (BMW's, Ferrari) and credit cards (Chase and AmEx credit).

On Wednesday, September 22, 2021, Zachary Paul Cruz appeared before a Federal Grand Jury at the United States Courthouse in Charlottesville, Virginia, where he gave testimony and was questioned by Ronald Huber and Mary Cleary, Assistant US Attorney's. Cruz testified before the Federal Grand Jury from 12:34 pm until 1:20 pm.

Upon reviewing a certified transcript of this testimony, your affiant discovered the following testimony: *(Transcript of AUSA Huber and Cruz)*

Q. Okay. Okay. And as far as you know, well, let me ask you this, have you ever given anyone permission to sign or cash the beneficiary check for you?

A. If anybody, I would've given it to Mike and Richard to do that.

Q. Pardon me.

A. If anybody, I would've given that permission to Mike and Richard to do that.

Q. Do you remember doing that?

A. I never remember us going over that, like talking about that.

Q. Okay. But you don't recall ever receiving the money; is that correct?




A. Yeah. No.

Q. No, you don't remember?

A. I don't remember receiving it.

Q. You do not. Okay.

A. I mean, I, I've been, I've been given a lot of money by Richard, but I've never, I've never been told, "Oh, this is your money from this."

 Magistrate	 Affiant	10/3/22 (TOR)  1:13 pm Date/Time
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Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

Q. Okay. Okay. Okay. Do you ever give them permission to use the money for anything specific? Pay the IRS?

A. No.

Q. Ever give him money to, yes, pay the IRS, did he ever talk to you about that?

A. No.

By reviewing the documents, Federal Grand Jury transcripts, and investigative documents provided to the Commonwealth by Federal authorities, your affiant believes that there is probable cause to assert that Zachary Paul Cruz is the victim of a conspiracy in violation of Virginia code § 18.2-22. Conspiracy to commit a felony, and § 18.2-178. Obtaining money or signature, etc., by false pretense by Donovan, Moore, and Shipe.

Investigation reveals to your affiant that Donovan, Moore, and Shipe orchestrated obtaining the funds Zachary Cruz was entitled to, upon learning of Cruz's entitlement through the Broward County courts when it was revealed that Cruz was the beneficiary of a large insurance annuity from MetLife. On 4/26/2019, Michael Donovan contacted MetLife about the insurance payout, and on 06/12/2019, Richard Moore takes Cruz to DuPont Community Credit Union in Verona, Augusta County, Virginia, and opens up a joint checking account with Cruz, using his address Orlando's cell phone number, and Richard Moore's encrypted email.

On 6/24/2019: Zachary Cruz is issued an identification card from the Commonwealth of Virginia, and documents revealed to your affiant reveal that in July of 2019, Michelle Dobbs, Paralegal, Nexus Derechos Humanos Attorneys, Inc. contacts MetLife to obtain a copy of the death certificate for Lynda Cruz, and a copy of a Beneficiary claim form. On 7/27/2019 a Beneficiary Claim Form signed and dated for Contract Number: 7700193269 is submitted to MetLife. Investigation revealed to your affiant that the phone number provided on the Beneficiary claim form: 757-344-5127 and email:remva777@protonmail.com belong to Richard Moore.

On 8/6/2019, Timothy Shipe, posing as Zachary Cruz, contacts MetLife in a recorded phone call to inquire about the settlement check and provides MetLife with FedEx shipping information. After his contact with MetLife, Shipe is in telephone contact with Michael Donovan.

FedEx TRK# 788974687804 is delivered Thursday, 8/08/2019 at 11:27 a.m. to Donovan and Moores's residence in Fishersville, Virginia. Two checks are enclosed in the FedEx package:

MetLife Checks:

Payable to Zachary Cruz for \$207.17

Payable to Zachary Cruz for \$426,553.30

These checks are deposited into Moore and Cruz's joint account by Jeffrey Jordan Bushong, Assistant Executive Administrator, Nexus Services, Inc. Thursday, 8/08/2019 at 2:12 PM.

J.O. Keffner
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13 pm
Date/Time

Section 4 (Cont.) *The material facts constituting probable cause that the search should be made are:*

Your affiant discovered that on 08/12/2019 at 11:30 a.m Richard Moore conducted a wire transfer at DuPont Community Credit Union for \$300,000.00 to Suntrust Atlanta Beneficiary: Williams Mullen Clark & Dobbins, PC. On 8/13/2019: at 2:15 pm, Richard Moore initiates a second wire transfer of \$100,000.00 from the joint account.

Upon reviewing the Federal Grand Jury testimony of Zachary Cruz on Wednesday, September 22, 2021, Cruz was represented at the time by attorneys employed by Nexus and indicated to the Grand Jury that he had not given permission to anyone to utilize his settlement money and that he did not permit Moore to utilize his settlement funds to pay the IRS.

Your affiant believes that there is probable cause to further this investigation and corroborate the aforementioned facts and that telephones, computers, portable electronics, disk drives, and electronic storage devices in the possession of Donovan, Moore, and Shipe, are certain to reveal further evidence of this conspiracy to obtain money by false pretenses from Zachary Paul Cruz.

Through investigation, and surveillance conducted, your affiant has corroborated that Michael Paul Donovan, Richard Moore, their son Samuel Orlando, and Zachary Paul Cruz all reside at 47 S. Windsong Court, in Fishersville, Augusta County, Virginia and that Timothy Wayne Shipe, resides at 1828 Springhill Road, in the City of Staunton. The Nexus business complex, where Donovan, Moore, and Shipe are employed is located at 113 Mill Place Parkway, in Verona, Augusta County, Virginia.

On September 26, 2022, your affiant appeared before the Augusta County Grand Jury to give testimony. The Grand Jury returned "True Bills" and sealed indictments on Donovan, Moore, and Shipe for violations of § 18.2-178.1 (A) Obtaining money or signature, etc., by false pretense, and Conspiracy.

Your affiant believes that there is probable cause to further this investigation and corroborate the aforementioned facts and that telephones, computers, portable electronics, disk drives, and electronic storage devices in the possession of Donovan, Moore, and Shipe, are certain to reveal further evidence of this conspiracy to obtain money by false pretenses from Zachary Paul Cruz.

Your affiant respectfully requests the issuance of a search warrant for 47 S. Windsong Court, Fishersville, Virginia, to secure phones, computers, electronic storage devices, and electronic evidence that will further the investigation into this case.

J.O. Keffer
Magistrate

3 Maj. Brian Jenkins
Affiant

10/3/22 1:13 pm
Date/Time